

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE; and  
WESTERN DISTRICT EASTERN DIVISION**

**Jon Hall,**

**Plaintiff, Petitioner,**

**V.**

**Middle District CASE No. 3:19-cv-00628  
Western District CASE No. 1:05-cv-01199-JDB-egb**

**Donald Trump, et.al., and**

**Defendants.**

**Carpenter / Mays**

**Respondents.**

**RECEIVED**

**JAN 21 2025**

**US DISTRICT COURT  
MID DIST TENN**

**MOTION TO CURE AND WAIVE FILING DEFECT**

Comes now Jon Hall, the plaintiff / petitioner, to show cause to cure the filing defect in this matter and request that the Middle District Court transfer the records / mail submitted by Sierra Colwell delivered at the Middle District of Tennessee Court at 719 Church Street, Suite 1300 Nashville Tennessee 37203, on September 5, 2024 weighing 1 lb. 7 ounces. In support of this motion, Mr. Hall requests that the late filing mail be transferred to the Western District Court, to be treated as a timely nunc pro tunc filed Motion to Reopen Federal Habeas Corpus under Thompson v. Bell, 373 F.3d 688, 733 (M.D. Tn. 2005) (Fraud on the Court - supplement the record);

1. The mail in question was sent to the plaintiff / petitioner's sister, and is the subject-matter of TDOC grievance # 24-0239/00367429, that was submitted in Hall v. Trump, 3:19-cv-00628, Document # 161-1, PageID # 1974-1977.

2. The reason the 1 lb. 7 ounce mail was sent to the plaintiff / petitioner's sister is for several reasons: (1) to gain legal help with a difficult matter in a capitol case; (2) a technical malfunction with Mr. Hall's word-processor; and (3) Mr. Hall was unjustly locked-down (a condition of confinement in which is before the Nashville Court at present).

3. Mr. Hall's court appointed counsel in the Federal Habeas Corpus action, has a personal interest in the case and will not assist Mr. Hall with re-opening his Federal Habeas Corpus, due to the underlying inherent personal conflict of interest in raising said claims. SEE: Hall v. Trump, 3:19-cv-00628, Document # 153-1, PageID # 1776 (Justification defense).

WHEREFORE, Mr. Hall requests that the two courts work out the transfer of timely filed mail records, filed in the wrong court, because Mr. Hall had to rely upon a third party (family members) to get the Motion to Reopen filed 9/5/24, and Mr. Hall just got notice of the record being filed on January 03, 2025 in the wrong court (Tracking number E1935593215US). See attached: affidavit of Jon Hall regarding filing in wrong court, and notice by Christmas Card.

Respectfully Submitted,

Jon Douglas Hall

Jon Douglas Hall # 238941

R.M.S.I. Unit 2, B-110

7475 Cockrill Bend Blvd.

Nashville, Tennessee 37209-1048

"I Jon D. Hall, **DECLARE UNDER THE PENALTY OF PERJURY**, that the foregoing information is true and correct, and based upon first hand knowledge." Carter v. Clark, 616 F.2d 228 (1980) **(28 U.S.C. § 1746; declaration under penalty of perjury)**. "Further deponent says not."

**EXECUTED ON:** 9<sup>th</sup> day of January 2025. **Signature:** Jon Douglas Hall.

**CERTIFICATE OF SERVICE**

I Jon D. Hall, hereby certify I mailed a true & exact copy of the foregoing Motion to Cure and Waive Filing Defect to: (1) Law Office of Sherrod, Roe, Voight, & Harbison, (SRVH) C/O Bill Harbison (2) Atty. Gen., Johnathon Skrmetti, P.O.Box 20207 Nash., Tenn. 37202; (3) Office of the Clerk, U.S. District Court-house, 719 Church Street, Suite 1300, Nashville, Tenn. 37203; and (4) U.S. District Court, 111 S. Highland Ave. # 262, Jackson, Tennessee 38301; via pre-paid U.S. mail on this the 16<sup>th</sup> day of January 2025.

The Dept of Corrections/RMSI  
HAS NOT inspected nor  
censored and is not  
responsible for the contents

Jon Hall # 238941  
RMSI U-2-B-110  
7475 Cockrill Bend Blvd.  
Nashville, Tennessee 37209-1048

Office of the Clerk  
U.S. Federal Courthouse  
719 Church Street, Suite 1300  
Nashville, Tennessee 37203

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LEGAL MAIL

1/19/25 7:20 PM B-Pa Mail

NOV 15 2025 AM 11:15 (H)

